

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 20-mj-681 (TNL)

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHADOR TOMMIE CORTEZ
JACKSON,

**SECOND JOINT MOTION FOR
CONTINUANCE AND EXCLUSION
OF TIME**

Defendant.

The United States of America, by and through its attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and Chelsea A. Walcker and John Docherty, Assistant United States Attorneys, and the defendant, Shador Tommie Cortez Jackson, by and through his counsel, Jordan Kushner, hereby jointly move the Court for a 45-day continuance and exclusion of time under the Speedy Trial Act to allow the parties additional time to review and analyze discovery and discuss potential options for case resolution.

The Speedy Trial Act requires that an information or indictment be entered within thirty days of a defendant's arrest. 18 U.S.C. § 3161(b). However, the Act includes a list of certain periods of delay that are excluded in computing the thirty-day period. *See* 18 U.S.C. § 3161(h). Section 3161(h)(7) excludes any period of delay for cause.

Here, Mr. Jackson was arrested on September 10, 2020, pursuant to a Criminal Complaint and Arrest Warrant. (*See* Docket Nos. 1–2.) The parties previously filed a joint motion for a continuance and to exclude time pursuant to § 3161. (Docket

No. 14). The Court granted that motion, excluded Speedy Trial time from October 10, 2020, through November 9, 2020. (Docket No. 15). Thus, the date by which an information or indictment must be filed is currently November 9, 2020.

The parties are working diligently to review discovery and negotiate a possible resolution to this matter. However, additional time is necessary to obtain and review documentation and finalize negotiations (a process slowed somewhat by the restrictions on defense counsel's ability to meet with Mr. Jackson due to the COVID-19 pandemic). Therefore, the parties jointly request a continuance of an additional 45 days, through December 24, 2020, and an exclusion of such time from the computation of the Speedy Trial Act, for good cause pursuant to 18 U.S.C. § 3161(h)(7). Mr. Jackson has discussed this matter with his undersigned counsel and voluntarily makes this request, with full knowledge of his rights under the Speedy Trial Act.

Respectfully Submitted,

ERICA H. MACDONALD
United States Attorney

Date: 11/2/2020

/s/ Chelsea A. Walcker
BY: CHELSEA A. WALCKER
JOHN DOCHERTY
Assistant United States Attorneys

Date: 11/2/2020

/s/ Jordan S. Kushner
JORDAN S. KUSHNER
Counsel for Defendant